

publication, registration date, and registration number issued by the United States Copyright Office is set forth on Exhibit B.

25. Plaintiff's evidence establishes that Defendant is a habitual and persistent BitTorrent user and copyright infringer.

Miscellaneous

26. All conditions precedent to bringing this action have occurred or been waived.

27. Plaintiff has retained counsel and is obligated to pay said counsel a reasonable fee for its services.

COUNT I
Direct Infringement Against Defendant

28. The allegations contained in paragraphs 1-27 are hereby re-alleged as if fully set forth herein.

29. Plaintiff is the owner of the Copyrights-in-Suit, as outlined in Exhibit B, each of which covers an original work of authorship.

30. By using BitTorrent, Defendant copied and distributed the constituent elements of each of the original works covered by the Copyrights-in-Suit.

31. Plaintiff did not authorize, permit or consent to Defendant's distribution of its works.

32. As a result of the foregoing, Defendant violated Plaintiff's exclusive right to:

(A) Reproduce the works in copies, in violation of 17 U.S.C. §§ 106(1) and 501;

(B) Redistribute copies of the works to the public by sale or other transfer of ownership, or by rental, lease or lending, in violation of 17 U.S.C. §§ 106(3) and 501;

(C) Perform the copyrighted works, in violation of 17 U.S.C. §§ 106(4) and 501, by showing the works' images in any sequence and/or by making the sounds accompanying the

works audible and transmitting said performance of the works, by means of a device or process, to members of the public capable of receiving the display (as set forth in 17 U.S.C. § 101's definitions of "perform" and "publically" perform); and

(D) Display the copyrighted works, in violation of 17 U.S.C. §§ 106(5) and 501, by showing individual images of the works nonsequentially and transmitting said display of the works by means of a device or process to members of the public capable of receiving the display (as set forth in 17 U.S.C. § 101's definition of "publically" display).

33. Defendant's infringements were committed "willfully" within the meaning of 17 U.S.C. § 504(c)(2).

WHEREFORE, Plaintiff respectfully requests that the Court:

(A) Permanently enjoin Defendant and all other persons who are in active concert or participation with Defendant from continuing to infringe Plaintiff's copyrighted works;

(B) Order that Defendant delete and permanently remove the digital media files relating to Plaintiff's works from each of the computers under Defendant's possession, custody or control;

(C) Order that Defendant delete and permanently remove the infringing copies of the works Defendant has on computers under Defendant's possession, custody or control;

(D) Award Plaintiff statutory damages per infringed Work pursuant to 17 U.S.C. § 504-(a) and (c);

(E) Award Plaintiff its reasonable attorneys' fees and costs pursuant to 17 U.S.C. § 505; and

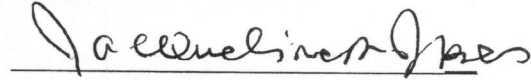
(F) Grant Plaintiff any other and further relief this Court deems just and proper.

DEMAND FOR A JURY TRIAL

Plaintiff hereby demands a trial by jury on all issues so triable.

Respectfully submitted,

By:

A handwritten signature in cursive script, appearing to read "Jacqueline M. James", written over a horizontal line.

Jacqueline M. James, Esq. (1845)

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File Hashes for IP Address 66.65.47.199

ISP: Time Warner Cable

Physical Location: New York, NY

Hit Date UTC	File Hash	Title
09/11/2014 17:40:36	37BF8BF13E2C577F8D39FE78E3785AB3353AAA76	Lisas Hidden Cam
09/10/2014 13:19:28	F219287698AEC6F0DD9565AB9BF366ACE5C61D21	Shes Not Alone
09/07/2014 00:29:02	D91FB4466FA9D3AA2A98F2DAFEA9AE2502D48E27	Our Little Cum Cottage
09/03/2014 13:41:33	4E185C5963B4B5D30D416714F03CAFE5C6940EF6	Shes A Spinner
09/02/2014 13:19:04	4BF2F710CE5D24981F1A2596B9FB6B45B61B2445	Apartment in Madrid
09/01/2014 16:46:42	3A5BC4BC9F1A1345A304F02FDDD1C6B9EC99AE93	Tiffanys Tight Ass
08/31/2014 15:17:18	B98DEDBF1597FAA14E9D6FF40E23CBC97EB1B552	Waterfall Emotions
08/31/2014 15:04:25	236B8DE8F2ED389695EA473E030F1765D1484096	Made for Each Other
08/31/2014 14:30:45	BD66395FF3128DFA826CCD80B3289B3E407B2142	Dancing Romance
08/31/2014 14:14:07	636186AE86D15A8ECFDD2FF5F13D828F0193AE5	Introducing Kaylee
08/23/2014 03:08:13	E57ED74659C45C36B915F7ED7F06AC247A2BD83A	Sexy En Noir
08/20/2014 23:43:34	82FAC802D1BAC7FFD6DF04D2BF87B0C47978A616	Angelica means Angel
08/17/2014 15:02:09	0A31B4EA60FBDB1DB52904901AA15024B77AC78C	Elevated Erotica
08/15/2014 17:25:12	A422699064F70D9733725CE8FB9E4F3FD266EAC8	A Dream Of You
08/14/2014 00:34:31	4AF5B7A945F14CCEAF6B0BBD3DE1676163E2A041	Thunderstorm Love
08/08/2014 13:24:11	FBC95C4CDE158BF73446B92F5DAD34BD625F3E85	In the Blind
08/05/2014 00:43:33	75DC57F5567F9F3FA7A6988F5510AC0ECA350315	Paint Me Beautiful
07/30/2014 03:34:55	0806FFC50EE89A1F31187B7FFFA777DDB4489E76	Pretty Little Belle
07/30/2014 03:09:29	8D2C71BBCC526E214853EB335EDBBDE2AF85FCDF	In for the Night
07/30/2014 02:10:34	9A90F57B86E1639BB344BAEF548861AB221715BA	Fashion Fantasy
07/29/2014 23:41:38	7825D161088332F8B7D8932616577FEDEFBBC9FC	Three Way is the Best Way
07/29/2014 19:52:16	0268E9DDAE675D77512B900CC09EDC420A336D21	Deep Blue Passion

EXHIBIT A

SNY20